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June 28, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Ex Parte* Presentation
CC Docket 92-237
NSD File No. 98-151

Dear Ms. Salas:

Enclosed is a copy of an *Ex Parte* presentation submitted to Commissioner Tristani and her office today. The necessary copies of this presentation are enclosed.

Sincerely,


John E. Logan

Copy Provided to:
The Honorable Gloria Tristani
Rick Chessen, Senior Legal Advisory to Commissioner Tristani
Sarah Whitesell, Legal Advisor to Commissioner Tristani

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28 June 1999
Q010-L-26

The Honorable Gloria Tristani
Commissioner
Federal Communications Commission
Washington, D.C. 20554

Re: North American Numbering Administrator
CC Docket 92-237
NSD File No. 98-151

Dear Commissioner Tristani:

As the Commission addresses the neutrality standards of the North American Numbering Plan Administrator (NANPA), an inquiry has been made of Mitretek Systems transition schedule. This letter summarizes Mitretek's commitment to a seamless transition, which ensures that consumer expectations and benefits are maximized.

*Innovative Technology
in the Public Interest*

The American consumer is entitled to rely on the fundamental public trust standards at stake in this case. The law rightfully makes clear that the NANPA not be aligned with any segment of the communications industry--that it be neutral, and not subject to the changing needs of private interests. Mitretek, as a private non-profit entity, embraces such a standard in its charter. The circumstances the Commission now finds itself in will not be repeated.

In response to the inquiry of the Commission's staff earlier this year, Mitretek submitted a detailed transition plan designed to accomplish a responsive, timely, and seamless transition. Four factors make a quick and seamless transition feasible:

- ***Thorough Understanding of Requirements and Guidelines.*** In 1997, Mitretek built a detailed and thorough knowledge and understanding of the North American Numbering Council (NANC) requirements and industry guidelines, and similarly detailed a thorough staff and systems operating capability. Our knowledge and understanding of number administration, as well as our staff and systems capabilities are demonstrated in our 1997 Proposal, which was evaluated by the NANC's NANPA Evaluation Working Group. Mitretek's NANPA Team continued to be ready to execute a NANPA

implementation through October 1997, when the FCC made a final NANPA selection decision. In the 18 months since then, Mitretek has continued to stay current on fundamental numbering administration policies, procedures, and new initiatives.

- ***Ability to Quickly Transition Systems and Continue Required Development.*** Prior to the 1997 release of the NANC Requirements Document, Mitretek began to design, build, and implement the computer support systems and databases central to our 1997 Proposal. Early versions of these systems were being brought on-line throughout the summer of 1997. These systems, and the developers of these systems, will be part of the System Transition Team. In our transition of functions from the current Lockheed Martin, Inc. (LMI) incumbent, Mitretek proposes to accept the current NANPA systems per the FCC's intellectual property rules. The knowledge and understanding of the underlying system functional requirements will assist the System Transition Team during transition, as well as in the evolution and development of the long-term NANPA systems. Since 1997, Mitretek has conducted research and projects that demonstrate the feasibility of and accelerated transition to the proposed 1997 architecture.
- ***Feasible Staffing Plan with Transition Leaders In-place.*** Our updated staffing plan provides transition teams' leaders that are already members of the Mitretek team. We continue to have in-place the nearly the complete team proposed in 1997. This team is still working telecommunications programs for a variety of telecommunications users, is building telecommunications engineering tools and related systems, and is eager to focus on an effective and efficient administration of the North American Numbering Plan should Mitretek, as the alternate NANPA, be asked to assumed these responsibilities. We continue to ensure that we are able to responsively add number administration staff. Through a knowledgeable executive search firm, that worked with us on our 1997 proposal and continued working with us in 1999, we have developed and updated a network of numbering administration professionals. We understand that the community of numbering administration professionals is of limited size. We understand that these professionals are interested in staying in the numbering administration community and, as a result, move to the organization that is the authorized NANPA. Such movement of professionals was demonstrated as the NANPA functions were moved from Bellcore and the regional Bell operating companies to Lockheed Martin. Mitretek has an attractive salary and benefits package to attract and retain such numbering administration professionals.

- ***Transition Will Be From One Organization.*** In 1997, our transition plan addressed the need to transition functions from Bellcore, seven Operating Companies, as well as other organizations performing number administration. In 1999, the transition plan must address only the current NANPA incumbent. Consolidation of the NANPA functions was achieved by the industry during the LMI transition. If the complete LMI transition is not completed by the FCC decision, Mitretek will complete that transition in a timeframe acceptable to the incumbent CO code administrator and NPA relief planner.

Notably, Mitretek, in its 1997 proposal, predicted the current circumstances in number exhaust, in contrast to the present administrator's prognosis. A Commission decision designating Mitretek as the NANPA will bring this expertise and vision to this vital responsibility and assist the Commission in its challenge to deliver a numbering plan administration that most benefits the American public.

The record is unchallenged as to Mitretek's capability to execute an expeditious and seamless transition with regard to both the industry and the public. Mitretek comprehends and shares the importance of this issue to the Commission's supervision of the North American Numbering Plan and will bring its substantial management and technical expertise to make it happen.

Please call upon me if I can provide any additional information.

Sincerely,



H. Gilbert Miller

HGM/dm

Copy provided to:

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Rick Chesson, Senior Legal Advisor to Commissioner Tristani